

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: ETHICON, INC.)
PELVIC REPAIR SYSTEM)
PRODUCTS LIABILITY LITIGATION)**

MDL NO.: 2327

**MOTION FOR APPROVAL TO UTILIZE QUALIFIED
SETTLEMENT FUND SUBACCOUNT FOR RECEIPT
OF COMMON BENEFIT FEES AND EXPENSES**

COMES NOW Harry F. Bell, Jr., one of the Plaintiffs' Counsel in this matter, and moves this Honorable Court for an Order authorizing the Common Benefit Fee and Cost Committee to make all Common Benefit fee and cost payments to the undersigned into the Harry F. Bell Qualified Settlements Fund Subaccount, a Qualified Settlement Fund under Internal Revenue Code § 468B and established by the Court's Pretrial Order #277 [ECF No. 5186].

WHEREFORE, the undersigned respectfully requests that the Court issue an Order authorizing the Common Benefit Fee and Cost Committee to issue all Common Benefit attorney fee and cost payments to the undersigned into the Harry F. Bell Qualified Settlements Fund Subaccount.

Respectfully submitted,

/s/ Harry F. Bell, Jr.
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